

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	Chapter 11
TEHUM CARE SERVICES, INC. <sup>1</sup>	Case No. 23-90086 (CML)
Debtor.	Re Dkt. Nos. 1813, 1814 & 1815

**NOTICE OF FILING OF PLAN SUPPLEMENT**

**PLEASE TAKE NOTICE** that, as contemplated by the *Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor* [D.I. 1815] (together with all schedules and exhibits thereto, and as may be amended, modified or supplemented from time to time, the “Plan”), the Official Tort Claimants’ Committee (the “TCC”), the Official Committee of Unsecured Creditors (the “UCC”) and Tehum Care Services, Inc. (the “Debtor” and, together with the TCC and the UCC, the “Plan Proponents”), hereby file this plan supplement (the “Plan Supplement”) with the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that the Plan Supplement includes the following exhibits (in each case, as may be amended, modified, or supplemented from time to time), which are included in the Plan Supplement as follows:

<b>Exhibit A</b>	Schedule of Assumed Executory Contracts and Unexpired Leases
<b>Exhibit B</b>	Schedule of Retained Causes of Action
<b>Exhibit C</b>	Cooperation Agreement
<b>Exhibit D</b>	Settlement Payment Schedule
<b>Exhibit E</b>	Identity of the PI/WD Trustee and PI/WD Trust Advisory Committee
<b>Exhibit F</b>	Identity of GUC Trustee and GUC Trust Advisory Committee
<b>Exhibit G</b>	PI/WD Trust Agreement
<b>Exhibit H</b>	GUC Trust Agreement

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

**PLEASE TAKE FURTHER NOTICE** that the Plan Proponents reserve all rights to amend, modify or supplement the Plan Supplement and any of the documents contained therein.

**PLEASE TAKE FURTHER NOTICE** that all exhibits and documents included in the Plan Supplement are incorporated into and are a part of the Plan as if set forth in full in the Plan. Please note, however, these documents have not yet been approved by the Bankruptcy Court. If the Plan is confirmed, the documents contained in the Plan Supplement will be approved by the Bankruptcy Court pursuant to the order confirming the Plan.

**PLEASE TAKE FURTHER NOTICE** that the hearing to consider confirmation of the Plan, including the Plan Supplement (the “Confirmation Hearing”), has been scheduled for March 3, 2025, at 10:00 a.m. (CT).

**PLEASE TAKE FURTHER NOTICE** that copies of the Plan and the Plan Supplement, as well as other documents filed in these Chapter 11 Cases, may be obtained (a) for a nominal fee from the Bankruptcy Court’s electronic docket for the Debtor’s Chapter 11 Case at <https://ecf.txsbs.uscourts.gov> (a PACER login and password are required and can be obtained through the PACER Service Center at [www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)), or (b) free of charge by accessing the Debtor’s case website maintained by the Solicitation Agent, <https://veritaglobal.net/tehum>.

Respectfully submitted this 7th day of February, 2025.

*/s/ Eric R. Goodman*

---

David J. Molton (*pro hac vice*)  
Eric R. Goodman (*pro hac vice*)  
D. Cameron Moxley (*pro hac vice*)  
Gerard T. Cicero (*pro hac vice*)  
Meghan McCafferty (*pro hac vice*)  
Amir Shachmurove (*pro hac vice*)  
**BROWN RUDNICK LLP**  
Seven Times Square  
New York, NY 10036  
Telephone: (212) 209-4800  
Facsimile: (212) 209-4801  
Email: [dmolton@brownrudnick.com](mailto:dmolton@brownrudnick.com)  
[egoodman@brownrudnick.com](mailto:egoodman@brownrudnick.com)  
[cmoxley@brownrudnick.com](mailto:cmoxley@brownrudnick.com)  
[gcicero@brownrudnick.com](mailto:gcicero@brownrudnick.com)  
[mmcafferty@brownrudnick.com](mailto:mmcafferty@brownrudnick.com)  
[ashachmurove@brownrudnick.com](mailto:ashachmurove@brownrudnick.com)

- and -

*/s/ Michael W. Zimmerman*

---

Michael W. Zimmerman  
**BERRY RIDDELL LLC**  
6750 E. Camelback Road, Suite #100  
Scottsdale, AZ 85251  
Telephone: (480) 385-2727  
Email: mz@berryriddell.com

*Counsel to the Tort Claimants' Committee*

*/s/ Nicholas Zluticky*

---

Nicholas Zluticky (SD TX Bar No. 3846893)  
Zachary Hemenway (SD TX Bar No.  
3856801)  
**STINSON LLP**  
1201 Walnut, Suite 2900  
Kansas City, MO 64106  
Telephone: (816) 842-8600  
Facsimile: (816) 691-3495  
Email: nicholas.zluticky@stinson.com  
zachary.hemenway@stinson.com

*Counsel to the Official Committee of  
Unsecured Creditors*

*/s/ Jason S. Brookner*

---

Jason S. Brookner (TX Bar No. 24033684)  
Micheal W. Bishop (TX Bar No. 02354860)  
Aaron M. Kaufman (TX Bar No. 24060067)  
Lydia R. Webb (TX Bar No. 24083758)  
Amber M. Carson (TX Bar No. 24075610)  
**GRAY REED LLP**  
1300 Post Oak Boulevard, Suite 2000  
Houston, Texas 77056  
Telephone: (713) 986-7127  
Facsimile: (713) 986-5966  
Email: jbrookner@grayreed.com  
mbishop@grayreed.com  
akaufman@grayreed.com  
lwebb@grayreed.com  
acarson@grayreed.com

*Counsel to the Debtor and Debtor in  
Possession*

**Certificate of Service**

The undersigned hereby certifies that, on the 7th day of February 2025, he caused a true and correct copy of the foregoing document to be served on all parties who have subscribed for electronic notice via the Court's CM-ECF Notification System.

*/s/ Eric R. Goodman*  
Eric R. Goodman